

Kent Ries, Attorney at Law
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COUNSEL FOR TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE: §
§
MCCLAIN FEED YARD, INC., et al.¹ § **CASE NO. 23-20084-RLJ-7**
§
§
Debtors. § **Jointly Administered**

**MOTION FOR APPROVAL OF EMPLOYMENT
OF COMPUTER CONSULTING SERVICES FOR TRUSTEE**

TO THE HONORABLE ROBERT L. JONES, BANKRUPTCY JUDGE:

COMES NOW, Kent Ries, Trustee (“Trustee”) of the referenced Chapter 7 bankruptcy estates, and files this Motion for Approval of Employment of Computer Consulting Services for Trustee, and in support thereof would respectfully show unto the Court as follows:

1. Debtors filed for relief under Chapter 7 of the United States Bankruptcy Code on April 28, 2023. Kent Ries was subsequently appointed and qualified to serve as the Trustee over the bankruptcy estate.
2. Trustee asserts it is necessary to employ computer consulting services, pursuant to 11 U.S.C. § 327, to perform necessary computer consulting services in obtaining and

¹ The Debtors in these Chapter 7 cases are: McClain Feed Yard, Inc. (Case No. 23-20084-RLJ), McClain Farms, Inc. (Case No. 23-20085-RLJ), and 7M Cattle Feeders, Inc. (Case No. 23-20086-RLJ)

investigating records and information of the Debtors, including copying hard drives and similar data memory from the Debtors' computers and cell phones.

3. Trustee desires that he be authorized to employ Canyon Rim Consulting, LLC, 301 S. Polk St., Suite 815, Amarillo, Texas 79101 ("Canyon Rim"), and to pay the firm such compensation and reimbursement of expenses as is just pursuant to 11 U.S.C. § 330 and Rule 2016 of the Federal Rules of Bankruptcy Procedure. Wayne Freeman's affidavit as required by 11 U.S.C. § 327 is attached hereto as Exhibit A and incorporated herein by reference for all purposes.

4. The normal rate for computer consulting services provided by Canyon Rim is \$235.00 per hour, plus out-of-pocket expenses.

WHEREFORE, PREMISES CONSIDERED, Kent Ries, Trustee herein, respectfully prays for an Order of this Court approving the employment of Canyon Rim to perform professional computer consulting services in these cases, and for such other relief, at law or in equity, to which the Trustee may show himself justly entitled.

Respectfully submitted,

Kent Ries, Attorney at Law
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By: /s/ Kent Ries
Kent Ries
State Bar No. 1691450

COUNSEL FOR TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of June 2023, a true and correct copy of the above and foregoing Motion was sent electronically or mailed in the United States mail, postage prepaid, to the parties listed below and the United States Trustee and other parties receiving notice via ECF.

Wayne Freeman
Canyon Rim Consulting, LLC
301 S Polk St., Suite 815
Amarillo, Texas 79101

/s/ Kent Ries
Kent Ries

THE STATE OF TEXAS
COUNTY OF POTTER

§
§
§

KNOW ALL MEN BY THESE PRESENTS:

AFFIDAVIT OF WAYNE FREEMAN

Before me, the undersigned authority, on this day personally appeared Wayne Freeman of Canyon Rim Consulting, LLC., of Amarillo, TX , being by me duly sworn, upon oath deposed and said:

1. I am a resident of Amarillo, Randall County, Texas; am over the age of 21 years and am of sound mind and have never been convicted of an offense.

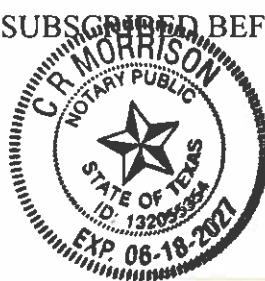
2. I have reviewed the *Motion* by the Trustee for approval to retain my firm as computer consultant in this Chapter 7 bankruptcy cases. I am a computer consultant with extensive knowledge and experience in the type of matters at issue in the Motion and am in all respects qualified to render the necessary services requested by the Trustee.

3. Canyon Rim Consulting, LLC, is disinterested and has no connection with the Debtor, creditors of the estate, any party in the United States Trustee's office or any other parties. Canyon Rim Consulting, LLC, does not have an interest adverse to the Estate.

FURTHER AFFIANT SAITH NOT.


Wayne Freeman

SWORN TO AND SUBSCRIBED BEFORE ME this 29 day of June, 2023.



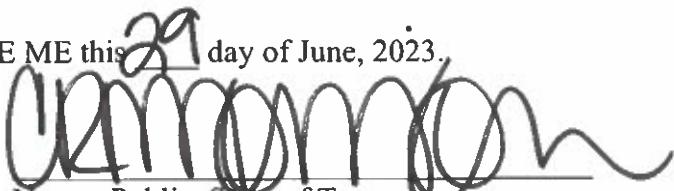

C.R. Morrison
Notary Public, State of Texas

EXHIBIT "A"